

Morgan, Laurie (ECY)

From: Hugh McEachen [hmceachen@eltopia.com]
Sent: Friday, March 30, 2012 12:21 PM
To: Morgan, Laurie (ECY)
Cc: Tom Myrum; Elaine Fuller; Craig Gyselinck; Stephanie Shopbell
Subject: Draft Permit-Monitoring Requirements- Hardness

Dear Ms. Morgan,

Thank you for the opportunity to comment on the Draft-Irrigation System Aquatic Weed Control National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General permit WA0991000.

Section 56. Monitoring Requirements (56.A Table of Sampling Parameters) for Total Hardness requires minimum sampling frequency to be taken "Concurrently with copper sampling". The Districts request that this requirement be changed to a frequency that would be representative of average hardness during the season of use for copper. A single sampling in July would represent the period of peak demand (flow) as well as the most likely time when algae control is needed (copper use).

Total hardness sampling has been conducted for copper compliance since the inception of permitting in 2002. This represents thousands of data points that adequately define hardness for the permitted Districts. Additional sampling for total hardness is redundant and unnecessary. Table 2- Average hardness values (mg/L) for irrigation districts from 2004-2005, found on page 31 of the Fact Sheet for the draft permit demonstrates the vast amount of data that has been compiled. The table summarizes 782 sample events for 8 districts with the average value for hardness at 122 mg/L. It is easy to see that there is a preponderance of the evidence for this parameter, and that it is not an unknown factor for the districts or Ecology.

The Districts request consideration for reduction of minimum sampling frequency for total hardness to not less than one representative sample (July) per year for each point of compliance.

Please feel free to contact me at (509) 531-2939 if you have any questions regarding this request.

Sincerely,

Hugh McEachen
Columbia Basin Project Agronomist